

### **REMARKS**

Claims 1-49 are pending in the present application. Reconsideration of the claims is respectfully requested.

**I. 35 U.S.C. § 103, Alleged Obviousness, Claims 1, 9, 10, 30, 36-37, and 47-48**

The Office rejects claims 1, 9, 10, 30, 36-37, and 47-48 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1) in view of Murphy et al. (U.S. Patent No. 6,096,096), and further in view of Shwartz et al. (U.S. Patent No. 6,243,071 B1). This rejection is respectfully traversed.

As to independent claims 1, 30, and 47, the Office states:

Regarding independent claim 1, Khan discloses a method in a data processing system for creating bookmarks (in col. 18, lines 15-65, the invention creates bookmarks), comprising: receiving a request to create a new bookmark for a document (in order to create a bookmark it is inherently necessary that a creation request is received); creating a bookmark link (since the reference bookmark is accessed remotely, it is necessary to create a link to it); and linking the bookmark link to the reference bookmark (linking the bookmark link is a necessary part of creating the bookmark link).

Khan fails to specifically disclose wherein the link is a symbolic link. However, Murphy discloses the use of symbolic links (column 9, lines 10-55). It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined Khan and Murphy, since it would have facilitated access to data on other file systems.

Khan further fail to disclose determining whether a reference bookmark already exists for the document. However, Shwartz discloses determining whether a reference bookmark already exists for the document (Figure 15, item 320; column 18, line 60-column 19, line 19). It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined Khan and Shwartz, since it would have allowed a user to avoid creating several static bookmarks to the same resource (Shwartz: column 18, lines 60-65).

Office Action dated November 21, 2005, pages 2-3.

Claim 1, which is representative of the other rejected independent claims 30 and 47 with respect to similarly recited subject matter, reads as follows:

1. A method in a data processing system for creating symbolic links to bookmarks, comprising:
  - receiving a request to create a new bookmark for a document;
  - in response to receiving the request, determining whether a reference bookmark already exists for the document;
  - if the reference bookmark for the document already exists, creating a symbolic link; and
  - linking the symbolic link to the already existing reference bookmark, wherein a new bookmark is not created.

Khan '038, Murphy, and Shwartz, either alone or in combination, do not teach or suggest in response to receiving the request, determining whether a reference bookmark already exists for the document; if the reference bookmark for the document already exists, creating a symbolic link; and linking the symbolic link to the already existing reference bookmark, wherein a new bookmark is not created.

Khan '038 is directed to a system for programming an Internet browser bookmark for delivering information to a user. In the Khan system a bookmark is created for forming a link to a web site to access the linked web site upon selection of the bookmark. In contradistinction, the presently claimed invention receives a request to create a new bookmark for a document, determines whether a reference bookmark already exists for the document for which the request to create the new bookmark is received and if the reference bookmark for the document already exists, creates a bookmark link which links the bookmark link to the already existing reference bookmark.

Nowhere, in any section, of Khan '038 is it taught or suggested to, in response to receiving a request to create a new bookmark, determine whether a reference bookmark already exists for the document. In the current Office Action, the Office acknowledges that Khan '038 does not teach this feature, however, now alleges that this feature is taught by Shwartz at column 18, line 60 to column 19, line 19, which reads as follows:

If decision step 314 determines that a bookmark has not been selected from the dialog box, the process moves to a decision step 318 which determines whether the "mark this page" button 332 (FIG. 16) has been selected. If so, a decision step 320 determines whether a bookmark already exists for the current page. Because only one bookmark should be inserted in a given page, an affirmative answer to decision step 320 results in the system ignoring the request to create a new bookmark. The process then proceeds to steps 308 and 328. If there is no bookmark on the current page, a process step 322 creates a new bookmark for the current page and

returns process control to step 308. If the "mark this page" button has not been selected, decision step 318 directs the process to decision step 324 which determines whether the "return to previous page" button 334 (FIG. 16) has been selected. If so, a process step 325 sets the current page equal to the previous page (i.e., the page displayed immediately before the currently displayed page) and displays the previous page (i.e., the new current page) as described above. Thereafter, process control returns to step 308. If none of the user events described in decision steps 304, 306, 310, 314, 318, and 324 has occurred (i.e., the answer to each of these steps is negative), the system awaits the occurrence of one of them by keeping the dialog box open. This is represented by the process control looping back to step 304 from step 324 when the answer to step 324 is negative.

In this section, Shwartz describes not creating a bookmark in response to determining whether a bookmark already exists. Thus, while Shwartz may determine if a bookmark already exists, the operation of Shwartz rejects creating a bookmark upon the determination that the bookmark already exists within a page. Shwartz' teachings are completely opposite of Khan '038's teachings that were previously relied upon as teaching the presently claimed feature. That is, Khan '038 merely describes the creation of a bookmark where a command is received to create a bookmark to a website, a bookmark is created forming a link to the website which will be accessed upon selection of the bookmark, storing the bookmark on a remote network server, storing a local bookmark on a client computer, and calling the bookmark stored on the remote network server upon detecting user selection of the local bookmark. Khan '038 does not provide for a determination of whether a bookmark already exists, but, rather, merely creates a new bookmark. Thus, the Khan '038 user may simply have multiple bookmarks referencing the same website.

Therefore, Khan '038 does not determine whether a book mark already exists and merely creates a duplicate bookmark and Shwartz describes not creating a bookmark in response to determining whether a bookmark already exists. Thus, Khan '038 and Shwartz, either alone or in combination, do not create a symbolic link **if the reference bookmark for the document already exists** and links the symbolic link to the already existing reference bookmark, as claimed in the present invention. The Office acknowledges that Khan '038 and Shwartz do not teach or suggest these features;

however, the Office alleges that these features are taught by Murphy at column 9, lines 10-55, which reads as follows:

If, at step 304, libmcd 204 determines that the end-user selected information is not on any of the plurality of compact discs containing the present Web site information, the present invention proceeds to step 312. At step 312, the present invention returns the fstat information from the operating system 208 of the present invention. If the desired information is not available via operating system 208, or otherwise available to the end-user, the Web server 202 returns a "file not found", "URL not located", or similar message, to the end-user via browser 200.

#### Virtual Document Root Design

In the present invention, the virtual document root is fundamentally composed of a symbolic link (symlink) to any one of the mounted compact discs in order to provide access to the common files. A symlink is said to be "dangling" when the symlink points to information which is not presently available. Once the symlink points to information which is presently available, the symlink is said to be static. In the present invention, a dangling symlink occurs when the symlink points to Web site information residing on a compact disc which is not currently mounted. Additionally, the virtual document root of the present invention is further comprised of a toolbox directory composed of symlinks to files and directories on the compact discs. These symlinks are static links which are created when the portable, off-line, Web site is created during the installation of the present invention. In the present embodiment, installation of the present invention occurs when the end-user starts the browsing process which first causes the Web server 202 to be initiated, followed by the initiation of the Web Browser 200. That is, the installation of the present invention happens in the background and is, thus, hidden from the end-user. As a result, the present invention appears to the end-user to emulate accessing a Web site using a standard on-line connection.

In a Web site having, for example, 24 thousand files, it could take tens of minutes and hundreds of megabytes of disk space to build a complete file-by-file linked tree. Such requirements are prohibitively burdensome to be used in the present embodiment of the present invention. Thus, the present invention employs a different method to build directories and subdirectories of the Web site information stored of the plurality of compact discs. In the present invention, there are large "chunks of data" collectively located on a particular compact disc (e.g. all of a directory and its subdirectories). The present invention creates a single symbolic link to the top directory of these "chunks". Any files above a chunk are linked on a file-by-file basis. For instance, any files in the parent directories of a chunk directory are linked on a file-by-file basis.

(Column 9, lines 5-55)

In this section, Murphy describes a symbolic link (symlink) that is an access link to a file residing on any one of the mounted compact discs. The symlink may be dangling or static. A dangling symlink points to information which is not presently available on a compact disc which is not currently mounted. A static symlink points to information that is presently available on a compact disc that is currently mounted. Thus, Murphy teaches a method of creating symbolic links to information on mounted compact discs. Murphy does not teach or suggest creating a symbolic link if the reference bookmark for the document already exists and linking the symbolic link to the already existing reference bookmark, wherein a new bookmark is not created.

Applicant respectfully submits that the Murphy reference is inappropriately applied to the presently claimed invention. The present invention is directed to creating symbolic links to bookmarks. The Murphy reference is directed to emulating on-line accessing of information in an off-line environment. Thus, one of ordinary skill in the art would not even look at Murphy to solve the problems addressed by the present invention, let alone be motivated to modify Murphy to arrive at the invention recited in claims 1, 30, and 47. Other than the Murphy reference merely mentioning the term "symbolic link," the Murphy reference is not directed to solving the same problem as the presently claimed invention. Therefore, the prior art, when considered as a whole, does not teach or suggest each and every claim limitation; thus, claims 1, 30, and 47 cannot be rendered obvious by a combination of Khan '038, Murphy, and Shwarts. That is, Khan '038 merely manipulates a newly created bookmark, Murphy merely creates a symbolic link to files on mounted compact discs, and Shwarts rejects creating a bookmark in response to determining whether a bookmark already exists.

Independent claims 9, 36 and 48 recite similar features to that of independent claims 1, 30, and 47. That is, independent claim 9, which is representative of the other rejected independent claims 36 and 48 with respect to similarly recited subject matter, recites "receiving a request to create a symbolic link for a document to an already existing reference bookmark, identifying the already existing reference bookmark in response to receiving the request, creating the symbolic link to the already existing bookmark; and linking the symbolic link to the already existing reference bookmark." (emphasis added)

Moreover, neither of the references teaches or suggests the desirability of incorporating the subject matter of the other reference. The Office alleges that the motivation would be to facilitate access to data on other file systems. However, as discussed, Khan '038 merely manipulates a newly created bookmark, Murphy merely creates a symbolic link to files on mounted compact discs, and Shwarts rejects creating a bookmark in response to determining whether a bookmark already exists. None of the reference teaches or suggests **in response to receiving a request to create a new bookmark for a document, determining whether a reference bookmark already exists for the document, creating a symbolic link if the reference bookmark for the document already exists, and linking the symbolic link to the already existing reference bookmark**, wherein a new bookmark is not created. Thus, the only teaching or suggestion to even attempt the alleged combination is based on a prior knowledge of Applicant's claimed invention thereby constituting impermissible hindsight reconstruction using Applicant's own disclosure as a guide.

One of ordinary skill in the art, being presented only with Khan '038, Murphy, and Shwarts, and without having a prior knowledge of Applicant's claimed invention, would not have found it obvious to combine and modify Khan '038, Murphy, and Shwarts to arrive at Applicant's claimed invention. To the contrary, even if one were somehow motivated to combine Khan '038, Murphy, and Shwarts, and it were somehow possible to combine the systems, the result would not be the invention, as recited in claim 1. The resulting system still would not determine whether a reference bookmark already exists for the document **in response to receiving a request to create a new bookmark for a document, creating a symbolic link if the reference bookmark for the document already exists, and linking the symbolic link to the already existing reference bookmark**, wherein a new bookmark is not created.

In view of the above, Applicant respectfully submits that the Khan '038, Murphy, and Shwarts, taken alone or in combination, fail to teach or suggest the features of claims 1, 9, 30, 36, 47, and 48. At least by virtue of their dependency on claims 9 and 36, the features of dependent claims 10 and 37 are not taught or suggested in the Khan '038, Murphy, and Shwarts, whether taken individually or in combination. Accordingly,

Applicant respectfully requests withdrawal of the rejection of claims 1, 9, 10, 30, 36, 37, 47 and 48 under 35 U.S.C. § 103.

**II. 35 U.S.C. § 103, Alleged Obviousness, Claims 2, 3, 5, 15, 16, and 32**

The Office rejects claims 2, 3, 5, 15, 16, and 32 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwartz et al. (U.S. Patent No. 6,243,071 B1), and further in view of Bauersfeld (U.S. Patent No. 5,917,491). This rejection is respectfully traversed.

Claims 2, 3, 5, 15, 16 and 32 are dependent on independent claims 1, 9, and 30 and, thus, these claims distinguish over Khan '038, Murphy, and Shwartz for at least the reasons noted above with regards to claims 1, 9, and 30. Moreover, Bauersfeld does not provide for the deficiencies of Khan '038, Murphy, and Shwartz and, thus, any alleged combination of Khan '038, Murphy, Shwartz, and Bauersfeld would not be sufficient to reject independent claims 1, 9, and 30 or claims 2, 3, 5, 15, 16, and 32 by virtue of their dependency.

Additionally, with regard to claim 16, Khan '038, Murphy, Shwartz, and Bauersfeld, taken alone or in combination, fail to teach or suggest in response to receiving a request to create a new bookmark for a document, determining whether a reference bookmark already exists for the document, creating a symbolic link if the reference bookmark for the document already exists, and linking the symbolic link to the already existing reference bookmark, wherein a new bookmark is not created. As discussed above, Khan '038 does not provide for a determination of whether a bookmark already exists in response to receiving a request to create a new bookmark for a document, but, rather, would merely create a new bookmark. Shwartz rejects creating a bookmark in response to determining whether a bookmark already exists. Thus, the Khan '038 user would have the capability of creating multiple bookmarks referencing the same website and Shwartz would not create a bookmark at all. Murphy and Bauersfeld are not relied upon as teaching this feature; however, Bauersfeld provides a page proxy for managing representations of page information and does not determine whether a bookmark already exists for the document.

Moreover, the Office may not use the claimed invention as an "instruction manual" or "template" to piece together the teachings of the prior art so that the invention is rendered obvious. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). Such reliance is an impermissible use of hindsight with the benefit of Applicant's disclosure. *Id.* Therefore, absent some teaching, suggestion, or incentive in the prior art, Khan '038, Murphy, Shwarts, and Bauersfeld cannot be properly combined to form the claimed invention. As a result, absent any teaching, suggestion, or incentive from the prior art to make the proposed combination, the presently claimed invention can be reached only through an impermissible use of hindsight with the benefit of Applicant's disclosure as a model for the needed changes.

In view of the above, Khan '038, Murphy, Shwarts, and Bauersfeld, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1, 9, and 30, from which claims 2, 3, 5, 15, 16, and 32 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 2, 3, 5, 15, 16 and 32 under 35 U.S.C. § 103.

### **III. 35 U.S.C. § 103, Alleged Obviousness, Claims 4, 20, and 31**

The Office rejects claims 4, 20, and 31 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwarts et al. (U.S. Patent No. 6,243,071 B1), and further in view of Reiter (U.S. Patent No. 5,642,503). This rejection is respectfully traversed.

Claims 4, 20, and 31 are dependent on independent claims 1, 9, and 30 and, thus, these claims distinguish over Khan '038, Murphy, and Shwarts for at least the reasons noted above with regards to claims 1, 9, and 30. Moreover, Reiter does not provide for the deficiencies of Khan '038, Murphy, and Shwarts and, thus, any alleged combination of Khan '038, Murphy, Shwarts, and Reiter would not be sufficient to reject independent claims 1, 9, and 30 or claims 4, 20, and 31 by virtue of their dependency.

Additionally, with regard to claims 4, 20, and 31, Khan '038, Murphy, Shwarts, and Reiter, taken alone or in combination, fails to teach or suggest wherein the step of linking the symbolic link to the **already existing** reference bookmark comprises storing a



pointer to the **already existing** reference bookmark in the symbolic link. The Office alleges that Reiter teaches this feature at column 3, line 65, to column 4, line 20, which reads as follows:

FIG. 3 is a block diagram of an entry 301 in the version store 105. The entry 301 comprises an address field 302, a user identification field 303, a commit time field 304, a forward link field 305, a backward link field 306, and a data field 307. The address field 302 contains the location of a corresponding record in the database 106. Preferably, the location of any record is represented by a page identifier and an offset to indicate the location of the record on the page. The user identification field 303 indicates which user caused the version to be created. The commit time field 304 indicates when the entry was committed. A user may undo or roll back an entry at any point in time before commit time. The forward link field 305 and the backward link field 306 contain pointers to other entries (i.e. versions) for the same record. The forward link field 305 contains a pointer to the next older entry (according to commit time) and the backward link field 306 contains a pointer to the next youngest entry (according to commit time). This linked list of entries in the version store 105 is referred to as a version chain. The data field 306 contains a copy of the record before begin time of the modification transaction.

In this section Reiter merely describes an entry in a version store that provides a forward link and a backward link that allows a user to undo or roll back an entry at any point in time before commit time. Thus, the user may go back to previous versions of a document or forward to the next older version until the user commits to a version. While Reiter may provide for the linking of different versions of a document, Reiter does not teach or suggest linking the symbolic link to the **already existing** reference bookmark which comprises storing a pointer to the **already existing** reference bookmark in the symbolic link.

In view of the above, Khan '038, Murphy, Shwarts, and Reiter, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1, 9, and 30, from which claims 4, 20, and 31 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 4, 20, and 31 under 35 U.S.C. § 103.

**IV. 35 U.S.C. § 103, Alleged Obviousness, Claims 6, 17, and 33**

The Office rejects claims 6, 17, and 33 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwarts et al. (U.S. Patent No. 6,243,071 B1), Bauersfeld (U.S. Patent No. 5,917,491), and further in view of Himmel (U.S. Patent No. 6,037,934). This rejection is respectfully traversed.

Claims 6, 17, and 33 are dependent on independent claims 1 and 30 and, thus, these claims distinguish over Khan '038, Murphy, and Shwarts for at least the reasons noted above with regards to claims 1 and 30. Moreover, Bauersfeld and Himmel do not provide for the deficiencies of Khan '038, Murphy, and Shwarts and, thus, any alleged combination of Khan '038, Murphy, Shwarts, Bauersfeld, and Himmel would not be sufficient to reject independent claims 1 and 30 or claims 6, 17, and 33 by virtue of their dependency.

In view of the above, Khan '038, Murphy, Shwarts, Bauersfeld, and Himmel, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1 and 30, from which claims 6, 17, and 33 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 6, 17, and 33 under 35 U.S.C. § 103.

**V. 35 U.S.C. § 103, Alleged Obviousness, Claims 7, 8, 34, and 35**

The Office rejects claims 7, 8, 34, and 35 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwarts et al. (U.S. Patent No. 6,243,071 B1), and further in view of Isreal et al. (U.S. Patent No. 6,330,007 B1). This rejection is respectfully traversed.

Claims 7, 8, 34, and 35 are dependent on independent claims 1 and 30 and, thus, these claims distinguish over Khan '038, Murphy, and Shwarts for at least the reasons noted above with regards to claims 1 and 30. Moreover, Isreal does not provide for the deficiencies of Khan '038, Murphy, and Shwarts and, thus, any alleged combination of

Khan '038, Murphy, Shwartz, and Isreal would not be sufficient to reject independent claims 1 and 30 or claims 7, 8, 34, and 35 by virtue of their dependency.

Additionally, with regard to claims 7, 8, 34, and 35, Khan '038, Murphy, Shwartz, and Isreal, taken alone or in combination, fail to teach or suggest if the reference bookmark for the document already exists, prompting a user whether to create the symbolic link, wherein the step of creating the symbolic link comprises creating the symbolic link in response to a user's request to create the symbolic link. The Office alleges that Isreal teaches this feature at column 12, lines 30-45, which reads as follows:

A Screen List 1050 lists the screens in the database and allows selection. Double-clicking a screen selects it and performs the OK-button function. The resizable-column widths are saved in the initialization file 390. Selecting a Find Button 1040 opens the Find Dialog Box 1100 (FIG. 11), which allows the user to search for a screen by screen ID, screen name, title, prompt or message. If this dialog box was accessed from the user screen 700, selecting the OK button closes this dialog box and displays the selected screen. If this dialog box 1100 was accessed from a Go To button on the Receipt & Status Area, Dynakeys, or Static Keys tabs in the Screen Design Dialog Box 1000, selecting the OK button closes this dialog box and displays the selected screen ID in the Go To field.

If a new screen ID has been entered, selecting the OK button results in a search of the screen list to determine whether the entered screen ID is in fact new. If a match is found (the entered screen ID is not new), a message box opens, explaining that the screen already exists and prompting whether to display it or have the pick-list item, Dynakey, or static key navigate to it. If a match is not found (the entered screen ID is new), opens a prompt box asking whether the user would like to create the screen. If the response is Yes, opens a Create Screen Dialog Box 1200.

Selecting a Cancel Button closes the dialog box without performing any actions. A Find Dialog Box 1100 is depicted in FIG. 11 which allows the user to search the screen list in the Screen Selection Dialog Box 1000 for a screen ID screen name, title, prompt or message. The Find Dialog Box 1100 opens when the Find button is selected in the Screen Selection Dialog Box 1000.

In this section Isreal merely describes that if a user enters a new screen ID, then a search of a current screen list is made to determine if the screen ID is in fact new. Nowhere in this section, or any other section of Isreal, is it taught or suggested to determine whether a reference bookmark already exists for the document for which the request to create the new bookmark is received. Khan '038, Murphy, Shwartz, and Isreal fail to create a bookmark link which is linked to an already existing reference bookmark. Thus, none of

the cited references would need to determine whether a reference bookmark already exists for the document for which the request to create the new bookmark is received and if the reference bookmark for the document already exists, to prompt a user whether to create the symbolic link, wherein the step of creating the symbolic link comprises creating the symbolic link in response to a user's request to create the symbolic link.

In view of the above, Khan '038, Murphy, Shwarts, and Isreal, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1 and 30, from which claims 7, 8, 34, and 35 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 7, 8, 34, and 35 under 35 U.S.C. § 103.

**VI. 35 U.S.C. § 103, Alleged Obviousness, Claims 11-14, and 38-40**

The Office rejects claims 11-14, and 38-40 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwarts et al. (U.S. Patent No. 6,243,071 B1), and further in view of Crandall et al. (U.S. Patent No. 6,321,228 B1). This rejection is respectfully traversed.

Claims 11-14 and 38-40 are dependent on independent claims 9 and 36 and, thus, these claims distinguish over Khan '038, Murphy, and Shwarts for at least the reasons noted above with regards to claims 9 and 36. Moreover, Crandall does not provide for the deficiencies of Khan '038, Murphy, and Shwarts and, thus, any alleged combination of Khan '038, Murphy, Shwarts, and Crandall would not be sufficient to reject independent claims 9 and 36 or claims 11-14 and 38-40 by virtue of their dependency.

In view of the above, Khan '038, Murphy, Shwarts, and Crandall, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 9 and 36, from which claims 11-14 and 38-40 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 11-14 and 38-40 under 35 U.S.C. § 103.

**VII. 35 U.S.C. § 103, Alleged Obviousness, Claims 18 and 19**

The Office rejects claims 18 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwartz et al. (U.S. Patent No. 6,243,071 B1), Isreal et al. (U.S. Patent No. 6,330,007 B1) and further in view of Bauersfeld (U.S. Patent No. 5,917,491). This rejection is respectfully traversed.

Claims 18 and 19 are dependent on independent claim 9 and, thus, these claims distinguish over Khan '038, Murphy, and Shwartz for at least the reasons noted above with regards to claim 9. Moreover, Bauersfeld and Isreal do not provide for the deficiencies of Khan '038, Murphy, and Shwartz and, thus, any alleged combination of Khan '038, Murphy, Shwartz, Bauersfeld, and Isreal would not be sufficient to reject independent claim 9 or claims 18 and 19 by virtue of their dependency. Additionally, the Office rejects claims 18 and 19 under similar rationale with respect to claims 7, 8, and 16. Thus, Applicant respectfully submits that these claims are sufficiently addressed with respect to claims 7, 8, and 16 above.

In view of the above, Khan '038, Murphy, Shwartz, Bauersfeld, and Isreal, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claim 9, from which claims 18 and 19 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 18 and 19 under 35 U.S.C. § 103.

**VIII. 35 U.S.C. § 103, Alleged Obviousness, Claims 21, 22, 41, 42, and 49**

The Office rejects claims 21, 22, 41, 42, and 49 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwartz et al. (U.S. Patent No. 6,243,071 B1), and further in view of Khan et al. (U.S. Patent No. 6,427,175 B1). This rejection is respectfully traversed.

As to independent claim 21, the Office states:

Regarding independent claim 21, the claim is analogous to claim 1 except that instead of bookmarks, bookmark folders are manipulated. However, Khan '175 discloses the use of bookmark folders as

organizational tools for bookmarks in lines 1-20 of the Abstract. It would have been obvious to one of ordinary skill in the art at the time of the invention to use bookmark folders in the context of Khan in the manner of Khan '175 in order to take advantage of bookmark folders' applicant as organizational tools for bookmarks.

Office Action dated November 21, 2005, pages 10-11.

Claim 21, which is representative of the other rejected independent claims 41 and 49 with respect to similarly recited subject matter, reads as follows:

21. A method in a data processing system for creating a plurality of symbolic links to bookmark folders from a single reference bookmark folder, comprising:  
receiving a request to create a symbolic folder link to an already existing reference bookmark folder;  
in response to receiving the request, identifying the already existing reference bookmark folder;  
creating the symbolic folder link to the already existing bookmark folder; and  
linking the symbolic folder link to the already existing reference bookmark folder.

Applicant respectfully submits that Khan '038, Murphy, Shwartz, and Khan '175, taken alone or in combination, fail to teach or suggest **in response to receiving the request to create a symbolic folder link to an already existing reference bookmark folder, identifying the already existing reference bookmark folder, creating the symbolic folder link to the already existing bookmark folder, and linking the symbolic folder link to the already existing reference bookmark folder.**

The Office rejects claims 21, 41, and 49 under similar rationale with respect to claims 1, 30 and 47. Thus, Applicant respectfully submits that these claims are sufficiently addressed with respect to claims 1, 30, and 47 above. That is, Khan '038 is merely describing the creation of a bookmark where a command is received to create a bookmark to a website, a bookmark is created forming a link to the website which will be accessed upon selection of the bookmark, storing the bookmark on a remote network server, storing a local bookmark on a client computer, and calling the bookmark stored on the remote network server upon detecting user selection of the local bookmark. Shwartz rejects creating a bookmark in response to determining whether a bookmark already exists. Khan '038 and Shwartz, either alone or in combination, do not teach or suggest

identifying the already existing reference bookmark folder in response to receiving the request to create a symbolic folder link to an already existing reference bookmark folder.

Although the Office acknowledges with respect to claims 1, 30, and 47 that Khan '038 does not teach or suggest creating a symbolic link if the reference bookmark for the document already exists and links the symbolic link to the already existing reference bookmark, the same acknowledgement is not made with respect to claims 21, 41, and 49. Additionally, although Shwartz and Murphy is included in the general rejection, any specific section of Murphy reference is not applied in the rejection. (See page 9-10 of the Office Action dated November 21, 2005) Nonetheless, Murphy teaches a method of creating symbolic links to information on mounted compact discs. Murphy does not teach or suggest creating the symbolic folder link to the already existing bookmark folder, and linking the symbolic folder link to the already existing reference bookmark folder. The presently claimed invention identifies the already existing reference bookmark folder in response to receiving the request to create a symbolic folder link to an already existing reference bookmark folder, creates the symbolic folder link to the already existing bookmark folder and links the symbolic folder link to the already existing reference bookmark folder. Khan '038 and Khan '175 do not provide for identifying if a reference bookmark folder already exists, but, rather, would merely create a new bookmark folder. Shwartz rejects creating a bookmark in response to determining whether a bookmark already exists. Thus, the Khan '038 and Khan '175 user would have the capability of having multiple bookmarks folders. The Shwartz user would be rejected from creating a bookmark in response to determining whether a bookmark already exists. Murphy merely creates symbolic links to files on mounted compact discs.

Thus, Khan '038, Murphy, Shwartz, and Khan '175, taken alone or in combination, do not teach or suggest the features of independent claims 21, 41, and 49 as is required under 35 U.S.C. § 103(a). At least by virtue of their dependency on independent claims 21 and 41, the specific features of dependent claims 22 and 42 are not taught by Khan '038, Murphy, Shwartz, and Khan '175, either alone or in combination. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 21, 22, 41, 42, and 49 under 35 U.S.C. § 103.

**IX. 35 U.S.C. § 103, Alleged Obviousness, Claims 23-26, and 43-46**

The Office rejects claims 23-26, and 43-46 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwartz et al. (U.S. Patent No. 6,243,071 B1), Khan et al. (U.S. Patent No. 6,427,175 B1), and further in view of Crandall et al. (U.S. Patent No. 6,321,228 B1). This rejection is respectfully traversed.

Claims 23-26 and 43-46 are dependent on independent claims 21 and 41 and, thus, these claims distinguish over Khan '038, Murphy, and Shwartz for at least the reasons noted above with regards to claims 21 and 41. Moreover, Khan '175 and Crandall do not provide for the deficiencies of Khan '038 and Murphy and, thus, any alleged combination of Khan '038, Murphy, Khan '175, and Crandall would not be sufficient to reject independent claims 21 and 41 or claims 23-26 and 43-46 by virtue of their dependency. Additionally, the Office rejects claims 18 and 19 under similar rationale with respect to claims 10-14. Thus, Applicant respectfully submits that these claims are sufficiently addressed with respect to claims 10-14 above.

In view of the above, Khan '038, Murphy, Shwartz, Khan '175, and Crandall, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 21 and 41, from which claims 23-26 and 43-46 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 23-26 and 43-46 under 35 U.S.C. § 103.

**X. 35 U.S.C. § 103, Alleged Obviousness, Claims 27 and 28**

The Office rejects claims 27 and 28 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwartz et al. (U.S. Patent No. 6,243,071 B1), Khan et al. (U.S. Patent No. 6,427,175 B1), and further in view of Bauersfeld (U.S. Patent No. 5,917,491). This rejection is respectfully traversed.

Claims 27 and 28 are dependent on independent claim 21, and, thus, these claims distinguish over Khan '038, Murphy, and Shwartz for at least the reasons noted above



with regards to claim 21. Moreover, Khan '175 and Bauersfeld do not provide for the deficiencies of Khan '038, Murphy, and Shwarts and, thus, any alleged combination of Khan '038, Murphy, Shwarts, Khan '175, and Bauersfeld would not be sufficient to reject independent claim 21 or claims 27 and 28 by virtue of their dependency. Additionally, the Office rejects claims 27 and 28 under similar rationale with respect to claims 1-3. Thus, Applicant respectfully submits that these claims are sufficiently addressed with respect to claims 1-3 above.

In view of the above, Khan '038, Murphy, Shwarts, Khan '175, and Bauersfeld, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claim 21, from which claims 27 and 28 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 27 and 28 under 35 U.S.C. § 103.

**XI. 35 U.S.C. § 103, Alleged Obviousness, Claim 29**

The Office rejects claim 29 under 35 U.S.C. § 103(a) as being unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), Murphy et al. (U.S. Patent No. 6,096,096), Shwarts et al. (U.S. Patent No. 6,243,071 B1), Khan et al. (U.S. Patent No. 6,427,175 B1), and further in view of Reiter (U.S. Patent No. 5,642,503). This rejection is respectfully traversed.

Claim 29 is dependent on independent claim 21, and, thus, these claims distinguish over Khan '038, Murphy, and Shwarts for at least the reasons noted above with regard to claim 21. Moreover, Khan '175 and Reiter do not provide for the deficiencies of Khan '038, Murphy, and Shwarts and, thus, any alleged combination of Khan '038, Murphy, Shwarts, Khan '175 and Reiter would not be sufficient to reject independent claim 21 or claim 29 by virtue of their dependency. Applicant respectfully submits that claim 29 is similar to claim 4 and, thus, Applicant respectfully submits that this claim is sufficiently addressed with respect to claim 4 above.

In view of the above, Khan '038, Murphy, Shwarts, Khan '175 and Reiter, taken either alone or in combination, fail to teach or suggest the specific features recited in

independent claim 21, from which claim 29 depends. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 29 under 35 U.S.C. § 103.

## **XII. Conclusion**

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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